

THOMAS A. ERICSSON, ESQ.  
Nevada Bar No. 4982  
ORONOZ & ERICSSON, LLC  
1050 Indigo Drive, Suite 120  
Las Vegas, Nevada 89145  
Telephone: (702) 878-2889  
Facsimile: (702) 522-1542  
tom@oronzolawyers.com

Attorney for Wendy Flores-Ramirez

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA, )  
Plaintiff, )  
vs. )  
WENDY FLORES-RAMIREZ, )  
Defendant. )  
)  
) CASE NO: 2:17-cr-395-JCM-NJK  
)  
) **STIPULATION TO CONTINUE  
SENTENCING**  
)  
) (First Request)  
)  
)

IT IS HEREBY STIPULATED AND AGREED by WENDY FLORES-RAMIREZ, by and through her attorney, THOMAS A. ERICSSON, ESQ., and the United States of America, by and through BRANDON C. JAROCH, ESQ., Assistant United States Attorney, that the sentencing hearing currently scheduled for September 19, 2018, at 10:00 a.m., be vacated and continued at least sixty (60) days past the current sentencing date to a date and time that is convenient to this Honorable Court.

The request for a continuance is based upon the following:

1. Defense Counsel is currently researching an issue with the Presentence Investigation Report that could potentially impact the sentencing in this case.
2. The parties require additional time to prepare for the sentencing hearing.

1           3. Defendant WENDY FLORES-RAMIREZ is not in custody, and she has no  
2           objection to the continuance.

3           4. Defense Counsel for WENDY FLORES-RAMIREZ, has spoken to AUSA  
4           BRANDON JAROCH, and he has no opposition to the continuance.

5           5. The additional time requested herein is not sought for purposes of delay.

6           6. The additional time requested by this Stipulation to Continue Sentencing is  
7           reasonable pursuant to Fed. R. Crim. P. 32(b)(2), which states that the “court  
8           may, for good cause, change any time limits prescribed by this rule.”

9           7. This is the first stipulation to continue the sentencing hearing filed herein.

10           8. Additionally, denial of this request for continuance could result in a miscarriage  
11           of justice.

12           DATED: September 5, 2018

13           Respectfully submitted,

14           \_\_\_\_\_  
15           /s/ *Thomas A. Ericsson*  
16           Thomas A. Ericsson, Esq.  
17           Oronoz & Ericsson, LLC  
18           1050 Indigo Drive, Suite 120  
19           Las Vegas, Nevada, 89145  
20           Attorney for Wendy Flores-Ramirez

21           \_\_\_\_\_  
22           /s/ *Brandon C. Jaroch*  
23           Brandon C. Jaroch, Esq.  
24           Assistant United States Attorney  
25           501 Las Vegas Boulevard, South, Suite 1100  
26           Las Vegas, Nevada, 89101  
27           Attorney for the United States of America

THOMAS A. ERICSSON, ESQ.  
Nevada Bar No. 4982  
ORONOZ & ERICSSON, LLC  
1050 Indigo Drive, Suite 120  
Las Vegas, Nevada 89145  
Telephone: (702) 878-2889  
Facsimile: (702) 522-1542  
tom@oronzolawyers.com

Attorney for Wendy Flores-Ramirez

**UNITED STATES DISTRICT COURT**

# DISTRICT OF NEVADA

\* \* \*

UNITED STATES OF AMERICA, ) CASE NO: 2:17-cr-395-JCM-NJK  
Plaintiff, )  
vs. ) **ORDER TO CONTINUE SENTENCING**  
WENDY FLORES-RAMIREZ, ) (First Request)  
Defendant. )

## **FINDINGS OF FACT**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds:

1. Defense Counsel is currently researching an issue with the Presentence Investigation Report that could potentially impact the sentencing in this case.
2. The parties require additional time to prepare for the sentencing hearing.
3. Defendant WENDY FLORES-RAMIREZ is not in custody, and she has no objection to the continuance.
4. Defense Counsel for WENDY FLORES-RAMIREZ, has spoken to AUSA BRANDON JAROCH, and he has no opposition to the continuance.

5. The additional time requested herein is not sought for purposes of delay.
6. The additional time requested by this Stipulation to Continue Sentencing is reasonable pursuant to Fed. R. Crim. P. 32(b)(2), which states that the “court may, for good cause, change any time limits prescribed by this rule.”
7. This is the first stipulation to continue the sentencing hearing filed herein.
8. Additionally, denial of this request for continuance could result in a miscarriage of justice.

## **CONCLUSION OF LAW**

The ends of justice served by granting said continuance outweigh the best interests of the public in proceeding with the sentencing hearing as scheduled, since the failure to grant said continuance would be likely to result in a miscarriage of justice at the sentencing hearing, taking into account the exercise of due diligence.

111

111

111

466

1

1

1

1

7

111

111

111

1111

## ORDER

IT IS THEREFORE ORDERED that the sentencing currently scheduled for September 19, 2018, at the hour of 10:00 a.m. be vacated and continued to the **26th day of November, 2018 at 10:30 a.m.**

DATED September 6, 2018.

James C. Mahan  
UNITED STATES DISTRICT JUDGE